

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Vadim Lander
Serial No.: 09/972,226
Filing Date: October 4, 2001
Confirmation No.: 4394
Group Art Unit: 2136
Examiner: Eleni A. Shiferaw
Title: **AUTHENTICATION AND AUTHORIZATION
 MAPPING FOR A COMPUTER NETWORK**

MAIL STOP AF

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

PRE-APPEAL BRIEF REQUEST FOR REVIEW

The following Pre-Appeal Brief Request for Review ("Request") is being filed in accordance with the provisions set forth in the Official Gazette Notice of July 12, 2005 ("OG Notice"). Pursuant to the OG Notice, this Request is being filed concurrently with a Notice of Appeal. Applicant respectfully requests reconsideration of the Application in light of the remarks set forth below.

REMARKS

Applicant contends that the rejections of Claims 1-30 on prior art grounds contain clear legal and factual deficiencies, as described below. In a Final Office Action mailed June 7, 2006 (the "Office Action"), Claims 1, 12, 18, 23, and 28 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,275,941 issued to Saito et al. ("*Saito*"). Claims 12-16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,178,511 issued to Cohen et al. ("*Cohen*") in view of U.S. Patent No. 6,609,198 issued to Wood et al. ("*Wood*") and U.S. Patent No. 6,898,577 issued to Johnson ("*Johnson*"). Claims 1-4, 6-11, and 18-30 were rejected under U.S.C. § 103(a) as being unpatentable over *Cohen* in view of *Wood*, *Johnson*, and U.S. Publication No. 2002/0161901 for Weissman ("*Weissman*"). Applicant requests a finding that these rejections are improper and allowance of all pending claims.

Section 102 Rejections

With respect to the 35 U.S.C. § 102 rejection of Claim 1, the Final Office Action contends *Saito* teaches "searching for information relating to [an] user in a repository of user information . . . based at least partially on [an] user request and a login identity supplied by said user" and "retrieving, from the repository of user information, a unique universal user identifier representing said user upon locating said information of said user." However, as discussed in Applicant's Response dated July 24, 2006 at page 9, *Saito* contains no such teaching. Instead, *Saito* discloses an integrated authentication server that stores authentication information, such as a user ID and password, for a user and issues the user an integrated certificate. See col. 5, ll. 51-56. According to the Examiner, this integrated certificate is a "unique universal user identifier." Office Action, p. 27. The user may then transmit the integrated certificate to an application server when requesting a service in place of his or her user ID and password. See abstract. The application server transmits the integrated certificate to the authentication server, which then retrieves the users' authentication information (e.g., user ID and password) and passes it back to the application server. See abstract; col. 5, ll. 33-50. The application server then uses this information to authenticate the user. See *id.* This process of retrieving a user ID and password corresponding to an user in a repository of user information based on a user's an integrated certificate, however, is not "retrieving, from the repository of user information, a unique

universal user identifier representing said user upon locating said information of said user.” For at least this reason, the rejection of Claim 1 is improper.

In response, the Examiner contends that *Saito* does indeed teach “retrieving, from the repository of user information, a unique universal user identifier,” and cites col. 2, ll. 28-39 and col. 5, ll. 51-56 as support. See Response to Arguments, Office Action, p. 2. The Examiner, however, misinterprets *Saito*. The portions of *Saito* cited by the Examiner disclose *generating* an integrated certificate, not “retrieving, from a repository of user information, a unique universal user identifier.” See col. 5, ll. 51-56 (“an integrated certificate is *issued* through the conventional log-in effected by inputting a user ID and a password . . .” (emphasis added)); col. 2, ll. 28-39 (“the integrated authentication server may check the user for the right to access the application server and if valid, the integrated authentication server may *prepare* a temporal integrated certificate . . .” (emphasis added)). In fact, the Examiner admits as much in the Advisory Action, saying *Saito* describes “*creating* [not retrieving] an integrated certificate through conventional log-in.” See Advisory Action, p. 2 (emphasis added). Generating an integrated certificate is the same as retrieving one from a repository of user information. As such, the arguments advanced by the Examiner are clearly misdirected. None of the portions of *Saito* cited by the Examiner teach, suggest, or disclose “searching for information relating to [a] user in a repository of user information . . . based at least partially on [a] user request and a login identity supplied by said user” and “retrieving . . . a unique universal user identifier representing said user upon locating said information of said user.” For at least this reason, the rejection of Claim 1 is improper. Therefore, Applicant respectfully requests that the rejection of Claim 1 be withdrawn.

Claims 12, 18, 23, and 28 include limitations similar to those in Claim 1. Therefore, Applicant submits that Claims 12, 18, 23, and 28 are allowable, for example, for reasons similar to those discussed above with regard to Claim 1. As such, Applicant respectfully requests that the rejections of Claims 12, 18, 23, and 28 be withdrawn.

Section 103 Rejections

With respect to the 35 U.S.C. § 103 rejection Claim 12, the Office Action contends the *Cohen-Wood-Johnson* combination suggested by the Examiner teaches, suggests, or discloses “retrieving . . . a unique universal user identifier corresponding to said user.” However, as discussed in Applicant’s Response dated July 24, 2006 at page 11, the portion of

Wood relied upon by the Examiner discloses “associating a unique session identifier with a set of access requests originating from a client entity and maintaining the unique session identifier across a credential level change.” Col. 3, ll. 4-6. *Wood*’s session identifier, however, is not a unique universal user identifier. As defined by *Wood*, a session is a “period and collection of states spanning one or more interactions between an entity [e.g., user] and an information environment.” Col. 5, ll. 25-36; *see also* col. 5, ll. 15-24. Since this definition distinguishes between a user and a session, the two cannot be analogous. Because of this, *Wood*’s session identifier also cannot be a unique universal user identifier. Moreover, since a user in *Wood* could have multiple sessions with multiple information environments, the user in *Wood* could have multiple unique session identifiers. As such, *Wood*’s unique session identifier is hardly a unique universal user identifier. Therefore, *Wood* clearly fails to teach, suggest, or disclose a unique universal user identifier as recited in Claim 12. For at least this reason, the rejection of Claim 12 is improper. As such, Applicant respectfully requests that the rejections of Claim 12 and all claims depending therefrom be withdrawn.

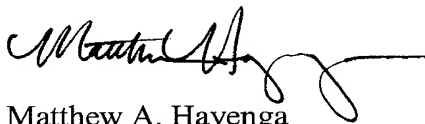
With respect to the 35 U.S.C. § 103 rejection of Claim 1, the Final Office Action contends the *Cohen-Weissman-Wood-Johnson* combination teaches, suggests, or discloses “retrieving, from the repository of user information, a unique universal user identifier representing said user.” However, as mentioned above with regard to Claim 12, the portion of *Wood* relied upon by the Examiner discloses “associating a unique session identifier with a set of access requests originating from a client entity and maintaining the unique session identifier across a credential level change.” Col. 3, ll. 4-6. A session identifier, however, is not a unique universal user identifier. Therefore, for at least this reason, the rejection of Claim 1 is improper. As such, Applicant respectfully requests that the rejections of Claim 1 and all claims depending therefrom be withdrawn.

Claims 18, 23, and 28 recite limitations similar to those in Claim 1. Therefore, Applicant submits that Claims 18, 23, and 28 are allowable, for example, for reasons similar to those discussed above with regard to Claim 1. As such, Applicant respectfully requests that the rejections of Claims 18, 23, and 28 and all claims depending therefrom be withdrawn.

CONCLUSION

As the rejections of Claims 1-30 contain clear deficiencies, Applicant respectfully requests full allowance of Claims 1-30. To the extent necessary, the Commissioner is hereby authorized to charge any required fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,
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